

# THE LAW OFFICE OF JEFF CHABROWE

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June 30, 2023

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *USA v. Nathanael Foucault*, Case No. 1:22-cr-00514-PGG-8  
Request for Bond Modification

Dear Judge Gardephe,

I am requesting that the defendant's bond be modified to remove the curfew enforced by location monitoring condition. Mr. Foucault has been fully compliant with the terms of his supervised release for 10 months now.

Pre-trial services and the government both consent to this request. Pre-trial cited Mr. Foucault's compliance to date and the fact that pre-trial did not recommend curfew enforced by location monitoring at his initial appearance as the justification for their consent. The government deferred to pre-trial.

Thank you for your time and consideration in this matter.

Respectfully submitted,



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**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**



**Paul G. Gardephe, U.S.D.J.**

Date: July 5, 2023